

(1) I write in support of all three proposals contained in the Notice of Proposed Rulemaking ET Docket 02-98, and I offer the specific comments below with regard to the subject of a domestic allocation at 60 m for the Amateur Radio Service (RM-10209).

(2) The Commission asks if a mandated listen-before-transmit protocol needs to be added to the rules for the Amateur Radio Service. No, this protocol is already ingrained in the service under the umbrella of "Good Amateur Practice" and is taught to all tyros as they enter our ranks. The Commission should look to the successful sharing at 30 m by the Amateur Radio Service as proof that incumbent stations at 60 m will be protected.

(3) The Commission asks what Amateur Radio operator license class or classes should be permitted access to the proposed 60 m band. Following the example employed on the allocations at 12 m, 17 m, and 30 m flowing from the 1979 World Administrative Radio Conference, the proposed 60 m band should be open to all Amateur Radio operators holding General, Advanced, or Extra class licenses. Access to the proposed domestic 60 m allocation should also be afforded to foreign amateur radio licensees who hold equivalent licensure while they are visiting areas regulated by the Federal Communications Commission in International Telecommunications Union Region 2.

(4) The Commission asks what power levels should be specified for the proposed 60 m band. Since amateur radio operators are already required to use the minimum power necessary, and since extraordinary communication impairments may necessitate substantial transmit power, the limit of 1500 W PEP transmitter output power should be applied to the 60 m band, just as it is to the adjacent 75 m and 40 m bands.

(5) The Commission asks if subbands should be specified within the proposed 60 m allocation for the various communication modes available to Amateur Radio operators. The general answer is no, for the Amateur Radio Service is completely capable of bandplanning and self-regulation as evidenced by its 160 m band (commonly known amongst radio amateurs as the "Gentleman's Band" by reason of its bandplanning and mode segmentation having arisen from within the Amateur Radio Service). The exceptions to this general answer are (1) for automatically controlled digital stations (47 CFR 97.221(b)) and (2) for stations in HF beacon operation as permitted by Special Temporary Authorizations. These two classes of stations need to be segregated to reduce their potential to cause interference owing to their inherent inability to listen before transmitting.

(6) The Commission also needs to modify the information regarding radio frequency radiation hazards given in 47 CFR 97.13(c)(1), and in Office of Engineering and Technology Bulletin Number 65 and Supplement B to OET Bulletin 65, so as to include references to the proposed 60 m band.

(7) Finally, the Commission should be specific in its Report and Order as to the exact time and day the proposed 60 m band will become available to the Amateur Radio Service, preferably stating it using Coordinated Universal Time so as to remove all ambiguity regarding time zones and locally observed civil time deviations.

Respectfully submitted,

Jan A. Tarsala
Licensee of Amateur Radio Station WB6VRN
Trustee for K6TY

510 East Wistaria Avenue
Arcadia, California 91006-4831

818.354.4564 daytime